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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**

19
20 RICHARD KADREY, an individual; SARAH
SILVERMAN, an individual; CHRISTOPHER
GOLDEN, an individual,
21

22 Individual and Representative Plaintiffs,

23 v.
24

META PLATFORMS, INC., a Delaware
corporation;
25

26 Defendant.
27

28 Case No. 3:23-cv-03417-VC

DECLARATION OF JUDD D. LAUTER

1 I, Judd Lauter, declare:

2 1. I am Special Counsel with the law firm Cooley LLP, counsel for Defendant Meta
 3 Platforms, Inc. (“Meta”) in this matter. I submit this declaration in support of Meta’s Motion to
 4 Dismiss Plaintiffs’ Complaint and attach several exhibits that are the subject of Meta’s concurrently
 5 filed Request for Consideration of Documents Incorporated by Reference Into the Complaint and
 6 for Judicial Notice (“RJN”). I declare that the following is true to the best of my knowledge,
 7 information, and belief, and that if called upon to testify, I could and would testify to the following.

8 2. Attached hereto as **Exhibit 1** is a true and correct screenshot of the February 24,
 9 2023 Meta blog post titled, “Introducing LLaMA: A foundational, 65-billion-parameter large
 10 language model,” located at <https://ai.meta.com/blog/large-language-model-llama-meta-ai/> and
 11 last accessed by me on September 15, 2023. Plaintiffs reference and quote from Exhibit 1 in
 12 Paragraphs 31 and 32 of the Complaint.

13 3. Attached hereto as **Exhibit 2** is a true and correct copy of the research paper
 14 published by Meta titled “LLaMA: Open and Efficient Foundation Language Models,” which was
 15 last accessed by me on September 15, 2023 at a link provided at the bottom of Exhibit 1,
 16 <https://arxiv.org/pdf/2302.13971.pdf>. Plaintiffs reference and discuss the contents of Exhibit 2 in
 17 Paragraphs 21 and 23 of the Complaint.

18 4. Attached hereto as **Exhibit 3** is a true and correct screenshot of the definition of
 19 “remove” from the Merriam-Webster online dictionary located at <https://www.merriam->
 20 [webster.com/dictionary/remove](https://www.merriam-webster.com/dictionary/remove), which was last accessed by me on September 15, 2023.

21 5. Attached hereto as **Exhibit 4** is a true and correct screenshot of the definition of
 22 “omit” from the Merriam-Webster online dictionary located at <https://www.merriam->
 23 [webster.com/dictionary/omit](https://www.merriam-webster.com/dictionary/omit), which was last accessed by me on September 15, 2023.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
 25 18th day of September, 2023 at San Francisco, California.

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/s/ *Judd Lauter*
 Judd Lauter